

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re:	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , ¹	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	X	Re: Docket No. 381

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF
DEBTORS FOR ENTRY OF ORDER EXTENDING PERIOD WITHIN
WHICH THE DEBTORS MAY REMOVE ACTIONS PURSUANT TO
28 U.S.C. § 1452 AND RULE 9027 OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE AND GRANTING RELATED RELIEF**

The undersigned hereby certifies that, as of the date hereof, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) have received no answer, objection, or any other responsive pleading with respect to the *Motion of Debtors for Entry of Order Extending Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure and Granting Related Relief* [Docket No. 381] (the “**Motion**”) filed by the Debtors with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on September 22, 2025.

The undersigned further certifies that they have reviewed the Court’s docket in this case and no answer, objection, or other pleading to the Motion appears thereon. Pursuant to the *Notice of Motion and Hearing* filed with the Motion, any objections or responses to the Motion were to be filed no later than October 6, 2025 at 4:00 p.m. (prevailing Eastern Time).

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

WHEREFORE, the Debtors respectfully request that the Proposed Order be entered at the earliest convenience of the Court.

Dated: October 7, 2025
Wilmington, Delaware

LATHAM & WATKINS LLP

Ray C. Schrock (admitted *pro hac vice*)
Candace M. Arthur (admitted *pro hac vice*)
1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Email: ray.schrock@lw.com
candace.arthur@lw.com

- and -

Jonathan C. Gordon (admitted *pro hac vice*)
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
Telephone: (312) 876-7700
Facsimile: (312) 993-9767
Email: jonathan.gordon@lw.com

/s/ Huiqi Liu

RICHARDS, LAYTON & FINGER, P.A.

Daniel J. DeFranceschi (No. 2732)
Zachary I. Shapiro (No. 5103)
Huiqi Liu (No. 6850)
Clint M. Carlisle (No. 7313)
Colin A. Meehan (No. 7237)
One Rodney Square
920 North King Street
Wilmington, Delaware 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
Email: defranceschi@rlf.com
shapiro@rlf.com
liu@rlf.com
carlisle@rlf.com
meehan@rlf.com

Co-Counsel for Debtors and Debtors in Possession